

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:21-CR-217-ID(3)

UNITED STATES OF AMERICA

vs.

JOHN CAMARDA

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INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about August 24, 2019 in the Eastern District of North Carolina, JOHN CAMARDA, the defendant herein, did knowingly receive visual depictions, that is, digital and computer images in files that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer. The productions of the visual depictions involved the use of a minor engaging in sexually explicit conduct and were depictions of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

COUNT TWO

Beginning on or about January 1, 2016 and continuing to on or about August 1, 2019, in the Eastern District of North Carolina, JOHN CAMARDA, the defendant herein, knowingly accessed with intent to view, and attempted to access with intent to view, one or more matters, that is, computer hard drives and digital medial containing digital images and videos, which contained any visual depiction that had

been mailed, shipped and transported using any means and facility of interstate and foreign commerce, including the Internet, and the production of such visual depictions involved the use of a minor, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct, and such visual depiction was of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(4)(B).

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FORFEITURE NOTICE

The named defendant is hereby given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of one or more of the offenses set forth in the Indictment, JOHN CAMARDA, the defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offense(s);

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.

The forfeitable property includes, but is not limited to:

- a. Dell Desktop Computer, s/n 9CKY2C1, seized from defendant on July 16, 2020
- b. WD 3.5 inch 80 GB hard drive, s/n WMAM9MZ14365
- c. Lenovo Desktop Computer, s/n LKHPWK6, seized from defendant on July 16, 2020
- d. WD 3.5 inch, 80 GB Hard Drive, s/n WMAM9A992652
- e. Dell Desktop Computer, s/n CTGJKF1, seized from defendant on July 16, 2020

f. WD 3.5 inch, 160 GB hard drive, s/n WMAP42237284

If any of the above-described forfeitable property, as a result of any act or omission of the defendant --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), through Title 18, United States Code, Sections 2253 or 1467, whichever may be applicable, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

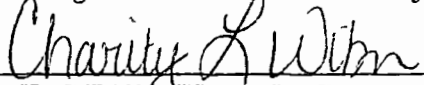
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

Foreperson

Date: 27 May 2021

G. NORMAN ACKER, III
Acting United States Attorney


BY: CHARITY L. WILSON
Assistant United States Attorney